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US EPA RECORDS CENTER REGION 5



1007458

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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Samuel S. Waldo  
Director of Environmental Affairs  
Amphenol Corporation  
358 Hall Avenue  
P.O. Box 5030  
Wallingford, Connecticut 06492-7530

HRE-8J

Re: Administrative Order On Consent  
dated November 27, 1990  
Franklin Power Products Co./Amphenol Corporation  
IND 044 587 848

Dear Mr. Waldo:

The United States Environmental Protection Agency (U.S. EPA) has received your letter dated September 22, 1995, and the revised Corrective Measures Study (CMS) report (dated September 1995) submitted in accordance with the above referenced Administrative Order On Consent (AOC). U.S. EPA has reviewed the revised CMS report and hereby disapproves the report. Certain revisions that were called for in U.S. EPA's letter of August 15, 1995, were not satisfactorily addressed, specifically general comments 1,2,3,4,6, and specific comments 6,7,10,15,16,17. Most critically, general comment 3 was not properly addressed. This comment specified that a detailed discussion of a groundwater extraction system for the contaminated area at Forsythe Street (Operable Area 3) be provided. This discussion was not provided.

Paragraphs A. and B. of Attachment I of the above referenced AOC specify that the CMS develop and describe corrective measures alternatives for remediation of contamination that adequately address all site problems and corrective action objectives. Due to your failure to provide in the revised CMS report, sufficient remedy options for an area which has significant contamination, and failure to provide other revisions to the CMS report as specified by U.S. EPA, Respondents are deemed to be in noncompliance of the AOC. Thus, pursuant to Section XVII.1.c. of the AOC, Respondents are subject to stipulated penalties as provided therein and the penalties are accruing starting with the date of receipt of this letter, and will continue to accrue at the rate of \$500 per day for the first one to seven days, and \$1000 for each seven-day delay, or part thereof, until this matter is resolved.

To discuss this matter or to arrange a meeting, please call Bill Buller of my staff at (312) 886-4568.

Franklin Power Products/Amphenol, Franklin, In

Amphenol - January 30, 1996 Meeting

Current Corrective Action Status Amphenol has submitted a draft CMS report and following EPA's comments a revised CMS report. The revised CMS report was disapproved by EPA.

Primary issue Forsythe Street (Area 3)

Background -- Due to leakage from sanitary sewer at middle of street VOC contamination occurs at the street and likely also on adjacent properties. VOC concentrations over 100 times MCLs. EPA's comment letter on draft CMS report specified that a additional remedies, such as a pump and treatment system should be presented in the revised report. EPA's primary reason for disapproving report is that EPA believes that it would not be in keeping with EPA's policy to identify contamination of this degree to the public without advising them that there are possible remedies and are discussed in the report.

Human Health risk maybe difficult to quantify, but chemical odors have been detected in basements near the street. EPA's basic policy is to cleanup groundwater to MCLs and this appears to be strongest argument for cleanup. Amphenol contends the waterbearing zone at street does not constitute an aquifer. EPA's Research Lab at Ada, Ok and HQ personnel have reviewed the essential data and advise that site should be cleaned up.

Amphenol's CMS proposes to install monitoring wells and sample at the street, suggesting that natural attenuation of contamination will result in satisfactory reduction of contaminants. Ada lab and HQ do not believe natural attenuation will be significant, and that a remedy should be immediately applied, that is additional data collection to measure attenuation does not provide a clear answer and only delays the cleanup.

#### Avenues of Resolution

1 Does Amphenol agree/commit to implement or at least explore a proactive remedy - that is a remedial remedy that will expedite contaminant reduction (pumping and treat, soil vapor extraction)

If Amphenol commits to proactive remedy

Does Amphenol revise report / or EPA? major revision would be to present a general discussion of a proactive remedy

EPA needs a schedule of implementation and Amphenol should proceed on their own, that is EPA does not approve mini or supplemental workplans

At some point implementation would close the dispute resolution



## 2 Issue of notification to residents

Nature of contamination no doubt will present a concern to residents at Forsythe Street. At this time residents have not had official notice of the localized contamination at Forsythe, however in general notification was provided by County Health Dept which advised of potential groundwater contamination.

Principal concern from EPA's standpoint is that public has the right to know and further delay could magnify the problem. Eventually the information will be public noticed, and no reason to believe that contamination will decrease significantly. Amphenol proposes to install monitor wells at the street, this will likely raise some questions by residents. Amphenol should answer as to how they really intend to handle these issues.

Another option would be to place RFI report in repository with public notice. However, this does not assure that all people will get the message. Conceivably, property could exchange hands in the interim without such knowledge.

### Some additional data collection issues

Hurricane creek sampling

Interim Measures data for pump and treat system at site

Other unaddressed comments in revised report

Sincerely,

Paul Little, Chief  
MI/WI Enforcement Section  
Enforcement & Compliance Assurance Branch

cc: J. Michael Jarvis, Franklin Power Products  
Michael Sickels, IDEM

bcc: Larry Johnson, ORC

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